

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No.: 16-cv-0644 (WMW/HB)**

<p>ELIZABETH BUSCH, on behalf of herself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>BLUESTEM BRANDS, INC.</p> <p style="text-align: center;">Defendant.</p>	<p><u>PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, CLASS NOTICE, CERTIFICATION OF SETTLEMENT CLASS, AND APPOINTMENT OF CLASS REPRESENTATIVE AND CLASS COUNSEL</u></p>
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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Elizabeth Busch will move and hereby does move, for: (i) conditional certification of Plaintiff as class representative, (ii) conditional certification of Plaintiff’s attorneys as class counsel, (iii) preliminary approval of Class Action Settlement Agreement pursuant to Rule 23 of the Federal Rules of Civil Procedure, (iv) approval of the manner and form of giving of the Class Notice; and (v) establishment of a time table for providing notice to the class, lodging objections to the terms of the settlement, and holding a hearing regarding final approval of the settlement.

This motion is made on the grounds that: (i) the settlement is in the best interests of the Settlement Class and the terms of the settlement are within the range of approval; (ii) the proposed manner and form of giving notice of the settlement to Settlement Class Members, given the practical constraints of this litigation, would fairly apprise Settlement

Class Members of the terms of the settlement; and (iii) the proposed timetable for publishing the class notice, lodging objections to the terms of the settlement, and holding a hearing regarding final approval of the settlement is appropriate.

This motion is based on this Notice of Motion and Unopposed Motion, the Memorandum of Points and Authorities, the supporting declarations and attachments thereto (including the Settlement Agreement), and the complete files and records in this action.

Respectfully submitted,

Dated: April 16, 2019

CONSUMER JUSTICE CENTER, P.A.

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Dated: April 16, 2019

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